



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
KALAMAZOO DISTRICT OFFICE



DAN WYANT  
DIRECTOR

April 3, 2014

Lynn Harmon  
International Paper  
1321 Third Street  
Three Rivers, Michigan 49093

SRN: B7985, St. Joseph County

Dear Lynn:

**VIOLATION NOTICE**

On January 7, 2014, International Paper was emailed a notification for the 2013 Administrative Rule 208a Registration Renewal from the Department of Environmental Quality (DEQ), Air Quality Division (AQD). The 208a Registration Renewal form was due on March 17, 2014.

The DEQ, AQD, Kalamazoo District Office, received the 208a Registration Renewal from International Paper on March 31, 2014.

Administrative Rule 208a(4) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), requires that the certification be renewed annually by submittal of a registration form in conjunction with the annual report of emissions.

In response to the late submittal of the 208a Registration Renewal form, you are hereby notified that International Paper is in violation of Act 451, Rule 208a(4).

Since the DEQ has received a late 208a Registration Renewal, the current registration no longer serves as a legally enforceable restriction on potential to emit. As a result, International Paper is now subject to the Renewable Operating Permit (ROP) program. Please notify the AQD within 21 days from the date of this letter as to how International Paper proposes to comply. Notification must include the appropriate action that will be taken to comply and the date by which the action will be completed. Any of the following actions would constitute an appropriate compliance program:

1. Submit an administratively complete application for an ROP pursuant to R 336.1210 within 12 months of exceeding any emission threshold accepted as a limitation under Rule 208a(2).
2. Submit an application for a Permit-to-Install to otherwise obtain legally enforceable permit limits pursuant to R 336.1201 within 60 days from the date of this letter.
3. Submit an acceptable demonstration that the potential to emit of the stationary source does not exceed any major source emission threshold specified in R 336.1211(1)(a) within 21 days from the date of this letter.
4. If International Paper believes the above observations or statements are inaccurate, or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Lynn Harmon  
Page 2  
April 3, 2014

Thank you for your attention to resolving the violation cited above. If you have any questions regarding the violation or the actions necessary to bring International Paper into compliance, please contact me at the telephone number listed below.

Sincerely,

A handwritten signature in cursive script that reads "Dennis Dunlap".

Dennis Dunlap  
Environmental Quality Specialist  
Air Quality Division  
269-567-3553

DD:CF

cc: Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Mary Douglas, DEQ